

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 13 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
CHRISTINA PRAMUDJI, M.D. FOR WAVE 13**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Christina Pramudji for Ethicon Wave 1, Dkt. 2035 (motion), Dkt. 2037 (memorandum in support), Dkt. 2236 (reply). Plaintiffs respectfully request that the Court exclude Christina Pramudji's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 11, 2019

Respectfully submitted,

/s/ D. Renee Baggett
Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: baylstock@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Cobos, Esperanza & Elijeo	17cv01986
Davidson, Nancy S. & Michael A.	15cv01436
Manes, Barbara & Richard	14cv28384
McCoy, Joyce	14cv28536
Walters, Bessie, deceased	14cv17181

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. Renee Baggett
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
rbaggett@awkolaw.com